

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

UNITED STATES OF AMERICA,

Plaintiff,

v.

ZACKARY ELLIS SANDERS,

Defendant.

Case No. 1:20-cr-00143  
Honorable T.S. Ellis, III

Pretrial conference: Jan. 15, 2021  
Trial: Feb. 9, 2021

**ZACKARY ELLIS SANDERS'S MOTION *IN LIMINE* TO EXCLUDE CHAT  
TRANSCRIPTS AND RELATED TESTIMONY FROM NON-TESTIFYING PERSONS**

Mr. Zackary Ellis Sanders, by and through counsel, respectfully moves this Court to exclude the substance of conversations that the Government alleges took place between Mr. Sanders and any Government witness who does not testify at trial. This motion is made pursuant to the Federal Rules of Evidence and the Confrontation Clause of the Sixth Amendment and is supported by a Memorandum in Support.

Respectfully submitted,

/s/  
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*Counsel for Defendant Zackary Ellis Sanders*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 18<sup>th</sup> day of December 2020, the foregoing was served electronically on the counsel of record through the U.S. District Court for the Eastern District of Virginia Electronic Document Filing System (ECF) and the document is available on the ECF system.

/s/ Emily Voshell  
Emily Voshell

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**[PROPOSED] ORDER**

Upon consideration of Mr. Zackary Ellis Sanders's Motion *in Limine* to Exclude Chat Transcripts and Related Testimony from Non-Testifying Persons ("Motion"), any Government opposition thereto, and the entire record in this matter, it is for good cause shown,

**ORDERED**, that Mr. Zackary Ellis Sanders's Motion is **GRANTED**, and it is further **ORDERED**, that Government testimony and exhibits about the purported online conversations between Mr. Sanders and any person the Government does not call as a witness at trial are **EXCLUDED**.

\_\_\_\_\_  
THE HONORABLE T.S. ELLIS

Date: \_\_\_\_\_

Alexandria, Virginia